Director, Ohio EPA October 31, 1986

Page 2

VW&R will continue to operate the MCC facilities without a break in business activities until VW&R has had an opportunity to analyze where changes in business activities should occur. VW&R will, of course, comply with all applicable requirements for notification, modifications of applications or permits, etc., before making any substantial changes in the operations of the MCC facilities.

A representative of VW&R will be contacting you shortly to confirm that the transfer or issuance of the new permits has been processed. Please call Thomas E. Nisler at your earliest convenience if you require any additional information or documentation prior to transferring or issuing the existing RCRA status or permits for the MCC sites.

Very truly yours,

Robert C. Thompson

of

GRAHAM & JAMES

RCT:tcd

cc: EPA Region V

Attn: RCRA Division, Ohio Branch

Mr. Fran Netting Motor Carrier Registration

Enclosures

PAKN52A4

Foremost-McKesson Chemical Group Eastern Region 136 Summit Avenue Montvale, NJ 07645 201 573 9480



October 20, 1981

U.S. EPA Region V RCRA Activities P. O. Box A 3587 Chicago, Illinois 60690

01f D071107791 Reference:<del>0HD039991690</del>

Gentlemen:

In November, 1980, we registered the above facility with your office as a generator and transporter of hazardous waste, and, in a separate letter the same month, as a treater and storer because of activity related to the neutralization and discharge of dilute waste water. Subsequently, in March, 1981, we modified the preceding to allow for temporary storage of spent solvents as classified under F001.

We now wish to modify further the capability for spent solvent storage at this facility, and to correct the identification of our landlord (Section VIII, page 4 of 5). Unfortunately, as noted in his enclosed letter, he chooses not to sign.

If any questions arise, please contact me at the Montvale, New Jersey office.

Thank you.

Sincerely,

McKESSON CHEMICAL COMPANY

D. M. Black

Regional Operations/Safety Manager

DMB: jh

cc: R. A. Girman - Cleveland Branch Manager

BCC: M. A. Minor

L. R. Vilotti



## GRAHAM & JAMES

ONE MARITIME PLAZA

THIRD FLOOR

SAN FRANCISCO, CALIFORNIA 94111

TELEPHONE (415) 954-0200

October 31, 1986 "

TELEX
W.U.340143 CHALGRAY SFO
M.C.I. 67565 GJ SFO

FACSIMILE GI/I(415) 391-5906 GI/II(415) 391-2493

CABLE

CHALGRAY, SAN FRANCISCO, CA

WRITER'S DIRECT DIAL NUMBER

AFFILIATED OFFICE

OTHER OFFICES

LOS ANGELES, CA

LONG BEACH, CA NEWPORT BEACH, CA

WASHINGTON, DC RALEIGH, NC

PALO ALTO, CA

NEW YORK, NY

SINGAPORE HONG KONG

MILAN

Director, Ohio EPA
Attn: Tom Crepeau
Division of Solid & Hazardous Waste Mgmt.
Box 1049
261 E. Broad St.
Columbus, OH 43216

RE: Transfer of McKesson Chemical Company's RCRA Status to Van Waters & Rogers, Inc. for the Cincinnati, Cleveland/Bedford Heights & Columbus, OH Facilit(ies)

Dear Mr. Crepeau:

On October 31, 1986, Van Waters & Rogers, Inc. ("VW&R") (formerly DSW, Inc.), which became a subsidiary of Univar Corporation on that date, acquired substantially all of the assets of McKesson Chemical Company ("MCC"), a division of McKesson Corporation. Your records will indicate that VW&R has on file with your agency an application for the transfer or issuance of (1) RCRA interim status, (2) Part B storage permit(s), and/or (3) generator/transporter status. Enclosed is a letter from McKesson authorizing the transfer of the MCC RCRA status to VW&R. Please proceed with the transfer or issuance of the MCC permits to VW&R at this time.

The original application material submitted to your agency indicated that the acquiring corporation was called "DSW, Inc." and that DSW, Inc. would be operating under the name, "Van Waters & Rogers." By letter dated October 19, 1986, we notified you that DSW, Inc. would change its name to "Van Waters & Rogers, Inc." at the time of closing. Accordingly, we enclose amended (1) Part A Applications (if applicable), (2) Part B Certifications (if applicable), and (3) Generator/Transporter Notification Forms in the name, "Van Waters & Rogers, Inc." which have been signed by an officer of VW&R. You will also find enclosed a financial responsibility submittal for VW&R.



# Bankers Trust Company

280 Park Avenue, New York, New York 10015

Henry A. Zarzicki Assistant Vice President Fiduciary Real Estate Service Section Telephone: 212-850-2392

Mailing Address: P.O. Box 1980, Church Street Station New York, New York 10008

October 13, 1981

RE: PEN 551-26601 Richmond Rd., Bedford Heights, Ohio PEN 552-1795 E. Moler Rd., Columbus, Ohio PEN 553-North Railroad St., Hummelstown, Pa.

Mr. D. M. Black Regional Operations/Safety Manager McKesson Chemical Company 136 Summit Avenue Montvale, New Jersey 07645

Dear Mr. Black:

In connection with the EPA application submitted with your letter of August 4th, we have determined that it is not our position to execute these forms since we are not a party to the business being conducted at these locations. This being the case, we are enclosing the original applications as per your request.

In accordance with the terms of the leases, please provide us with complete signed copies of the insurance policies with details on the extent of coverages.

Very truly yours

Enclosures

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# 3 SEPA

## U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION

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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Continued from the front.

EPA Form 3510-3 (6-80)
PAGE 3 \_\_\_\_ OF 5

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24

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26

CONTINUE ON REVER

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

. NAME (print or type)

M. A. Minor

Regional Vice Presiden

3. SIGNATURE

ļ

C. DATE SIGNED

9/9/81

EPA Form 3510-3 (6-80)



To Whom It May Concern:

McKesson Chemical Company, which is an operating division of Foremost McKesson, Inc., is a distributor of various chemical products for various suppliers of chemicals. It operates a large number of distribution facilities throughout the country, of which this is one. We stock an average of five-hundred (500) packaged chemical products at these locations. The products carried will vary from location to location and from time to time. It is anticipated that some or all of the products could at one time or another result in the generation of a hazardous waste and the amount generated could in one or more instances exceed the quantity limit for a small generator. Since ours is a distributing function it is impossible for us to be more specific at this time.

G. N. Butter

Technical Director

McKesson Chemical Company

GNB:ks

attachment (Form GSA No. 0246-EPA-OT)

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Tark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification.

If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

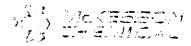
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IX. DESCRIPTION OF HAZARDO	OUS WASTES (continued fro	om front)		
A. HAZARDOUS WASTES FROM NON waste from non—specific sources you			CFR Part 261.31 for c	ach listed hazardous
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B. HAZARDOUS WASTES FROM SPECific industrial sources your install			art 261.32 for each list	ed hazardous waste from
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C. COMMERCIAL CHEMICAL PRODU	CT HAZARDOUS WASTES. E	nter the four—digit number from	n 40 CFR Part 261,33	for each chemical sub-
stance your installation handles which	r may be a hazardous waste. Us	e additional sheets if necessary.	See attachme	nt.
31 3	33	34	35	. 36
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D. LISTED INFECTIOUS WASTES. En hospitals, medical and research labora				rom hospitals, veterinary
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E. CHARACTERISTICS OF NON-LIST hazardous wastes your installation had			nding to the characteri	stics of non—listed
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I certify under penalty of law the attached documents, and that bas I believe that the submitted informitting false information, including	nat I have personally examinated on my inquiry of those mation is true, accurate, an	ned and am familiar with the individuals immediately read ad complete. I am aware the	sponsible for obtain	ing the information,
SIGNATURE	· ·	OFFICIAL TITLE (type or prin		DATE SIGNED
-Mautic		N. Butter, Technica esson Chemical Comp		8-14-80

EPA Form 8700-12 (G-80) REVERSE

I.D. - FOR OFFICIAL USE ONLY

Foremost-McKesson Chemical Group Eastern Region 136 Surnmit Avenue Montvale, NJ 07645 201 573 9480



May 13, 1981

U.S. EPA Region V Sites Notification P. O. Box 7861 Chicago, IL 60604

Gentlemen:

## RE EPA Number#0HD071107791

Attached is a copy of EPA Form 8900-l submitted in behalf of our branch at Cleveland, OH, which is currently transporting a listed hazardous waste to a reclaiming facility as identified.

Please note that Items D and E are completed only in items of our branch's specific activity, since we have no knowledge of the reclaimer's overall business; similarly, Items F and G call for information we have no way of obtaining.

If any questions arise, please contact me at the above address or at (201) 573-9480.

Sincerely,

McKESSON CHEMICAL COMPANY

8. M. Black

Regional Operations/Safety Manager

DMB:jh

ATTACHMENT

cc: R. A. Girman BCC: M. A. Minor

L. Vilotti

B. L. Wilcox, Jr.



# WEFA Notification of Hazardous Waste Site

United States Environmental Protectic Agency Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of

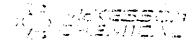
<u></u>	Person Required to Notify:			^ C		MCKESSO	N CHEMICAL	COMPAI	
	Enter the name and address of the por organization required to notify.	erson		<u>A. G</u> 6601 R	chmond		CHEMICAL	. CUMPA	N I
	•				Heights		State OH		44146
			CHY D				State	Zip Code	
В	Site Location: Enter the common name (if known) a	and	Name of Sue	Chem	tron Cor	poratio	n	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
	actual location of the site.		Street	3585	Schnei	der Cou	rt	\$,	
			city Av	o <b>n</b>	County	Lorain	State OH	Zip Code	44011
$\overline{c}$	Person to Contact:		,	· · · · · · · · · · · · · · · · · · ·				· · · · · · · · · · · · · · · · · · ·	
	Enter the name, title (if applicable), a business telephone number of the peto contact regarding information submitted on this form.				73-9480		gional Ope	er <u>ation</u>	s/Safety Mgr.
	•							·	
D	Dates of Waste Handling:			•	_				
	Enter the years that you estimate water treatment, storage, or disposal began ended at the site.		From (Year)	1981	To (Year)	prese	nt		:
	Place an X in the appropriate Pl		of Waste: X in the app	propriate	EPA has listed in appropria the list o	the regulation te four-digit f hazardous	our-digit numberns under Section number in the wastes and code	on 3001 of I boxes provi es can be o	RCRA, Enter t ded. A copy o btained by
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Form Approved OMB No. 2000-0138

EPA Form 8900-1

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F	Waste Quantity:	Facility Type	Total Facility Waste Amount
	Place an X in the appropriate boxes to	1. 🗆 Piles	cution feet
	indicate the facility types found at the site.	2.   Land Treatment	gattoos
<i>.</i>	In the "total facility waste amount" space give the estimated combined quantity	3. □ Landfill 4. □ Tanks	
_ (::	(volume) of hazardous wastes at the site using cubic feet or gallons.	5. 🗆 Impoundment	Total Facility Area
_	In the "total facility area" space, give the	6.  Underground Injection	square feet
	estimated area size which the facilities occupy using square feet or acres.	7. Drums, Above Ground 8. Drums, Below Ground	acres
	occupy coming equations are account.	9.  Other (Specify)	
G	Known, Suspected or Likely Releases to		
G	Place an X in the appropriate boxes to indicate		☐ Known ☐ Suspected ☐ Likely ☐ None
	or likely releases of wastes to the environmen		
	Note: Items Hand I are optional. Completing hazardous waste sites. Although completing	these items will assist EPA and State at the items is not required, you are encou	nd local governments in locating and assessin uraged to do so.
H	Sketch Map of Site Location: (Optional	)	
	Sketch a map showing streets, highways, routes or other prominent landmarks near		,
	the site. Place an X on the map to indicate		·
	the site location. Draw an arrow showing the direction north. You may substitute a		,
	publishing map showing the site location.		
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	•		<u>.</u> `
- C:			
	Description of Site: (Optional)		
•	Describe the history and present		•
	conditions of the site. Give directions to the site and describe any nearby wells,		
	springs, lakes, or housing. Include such information as how waste was disposed	•	· •
	and where the waste came from. Provide		
	any other information or comments which may help describe the site conditions.		•
	:		
		•	
			:
J	Signature and Title:	W.C.V.F.S.	SON CHEMICAL CO
	(such as plant managers, superintendents,	Name D. M. Black - MUKES	— U Owner, Present
(2)	trustees or attorneys) of persons required to notify must sign the form and provide a	Street 136 Summit Avenue	☐ Owner, Past ☐ Transporter
	mailing address (if different than address in item A). For other persons providing	Montvale	N.I 07645 Q Operator, Presen
	notification, the signature is optional.	City State	Zip Code
	Check the boxes which best describe the relationship to the site of the person	Moslas	5/13/P1 5 Other
	required to notify. If you are not required to notify check "Other".	Signature ()	DATE JIJJU J

Foremost-McKesson Chemical Group Eastern Region 136 Summit Avenue Montvale, NJ 07645 201 573 9480



May 11, 1981

U.S. EPA Region V 230 South Dearborn Street Chicago, Illinois 60604

Gentlemen:

RE: Closure Plan - Storage Facility EPA ID Number - OHD071107791

The McKesson Chemical Company Branch located at Cleveland, Ohio, is registered as a storage facility. In fact, it is only a point at which the Company accumulates materials received from customers, which might otherwise be deemed hazardous waste, which are destined for transportation to a recycling facility.

This facility will continue to operate for as long as it is deemed economically viable by the Company and so long as its operation is otherwise permitted by applicable law.

All storage of regulated materials will be in approved, portable containers of a capacity of 55 gallons or less. When and if closure occurs, it will be accomplished by transporting all such stored material on hand to an approved recycling or other treatment or disposal facility.

It is presently contemplated that the maximum amount of such material on hand would be 40-80 drums.

it should be possible to complete closure within a maximum period of one week and based on current transportation costs for the estimated maximum amount of material that might be on hand at any one time, the total cost of closure should not exceed \$300.00.



Page 2

RE: Closure Plan - Storage Facility EPA ID Number - OHD071107791

Since no processing or transfer of this material is contemplated, other than the clean-up of any spill or leak that might conceivably occur (and for which there are contingency plans), no costs for decontamination, monitoring or other such closure procedures should be incurred.

In view of the foregoing, no post closure care would be required for this facility and no post closure plan will be prepared.

The responsible person at this branch is R. A. Girman, Branch Manager.

Sincerely,

McKESSON CHEMICAL COMPANY

D. M. Black

Regional Operations/Safety Manager

DMB:jh

cc: R. A. Girman

BCC: L. Vilotti

M. A. Minor

B. L. Wilcox, Jr.

McKesson Chemical Company

Foremost-McKesson Chemical Group Eastern Region 136 Surnmit Avenue Montvale, NJ 07645 201 573 9480



March 10, 1981

USEPA Region V 230 South Dearborn Street Chicago, Illinois 60604

Gentlemen:

Due to an inadvertent clerical error, our recent letter to you (copy attached) contained only a copy of the topographical map locating our Bedford Heights (Cleveland) OH facility, rather than the original.

The latter is enclosed with this letter, and we will appreciate you placing it in our Cleveland file.

Thank you.

Sincerely,

McKESSON CHEMICAL COMPANY

D. M. Black

Regional Operations/Safety Manager

DMB: jh



Foremost-McKesson Chemical Group Eastern Region 136 Summit Avenue Montvale, NJ 07645 201 573 9480



March 8, 1981

USEPA Region V 230 South Dearborn Street Chicago, Illinois 60604

### Gentlemen:

On November 18 we filed with your office a modified Notification of Hazardous Waste Activity for our facility in Bedford Heights (Cleveland) OH, extending our original registration to include a storage facility. The second Notification acknowledged certain items of information were missing, and we now include these: facility drawing, photographs, geographical location.

We appreciate your acceptance of our delay, and continue to stand ready to meet your requirements.

Our responsible contact at the facility continues to be  $R.\ A.\ Girman.$ 

Please change our telephone number under VIII-D to (415) 983-8300.

Sincerely,

McKESSON CHEMICAL COMPANY

D. M. Black

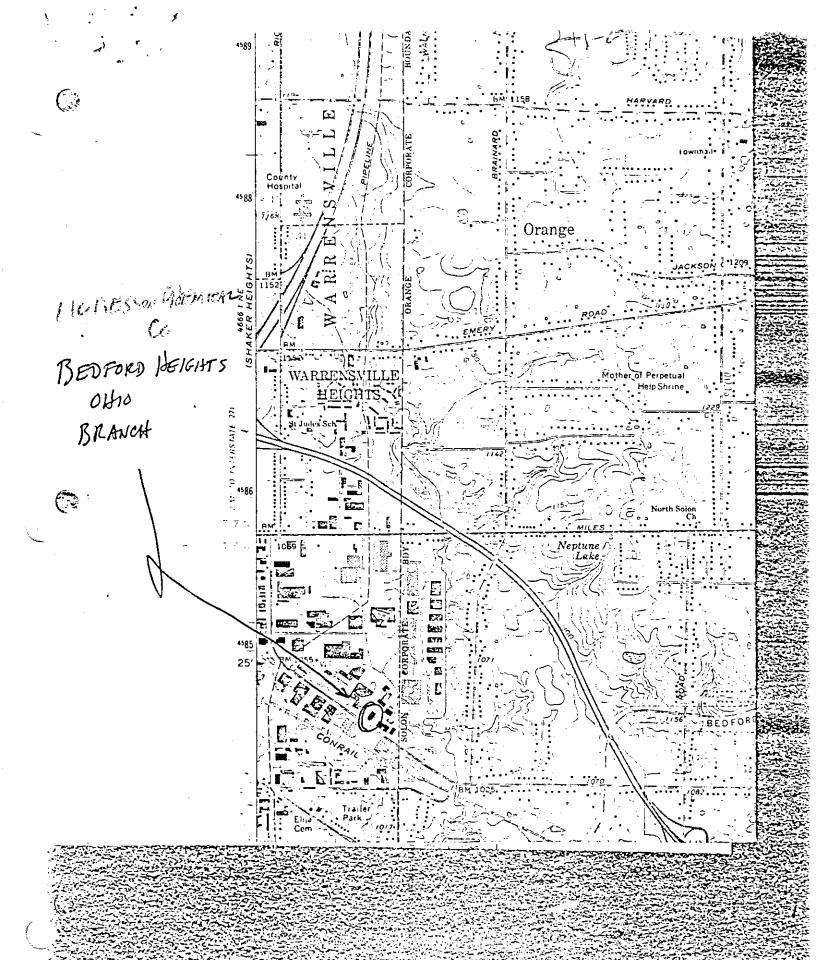
Regional Operations/Safety Manager

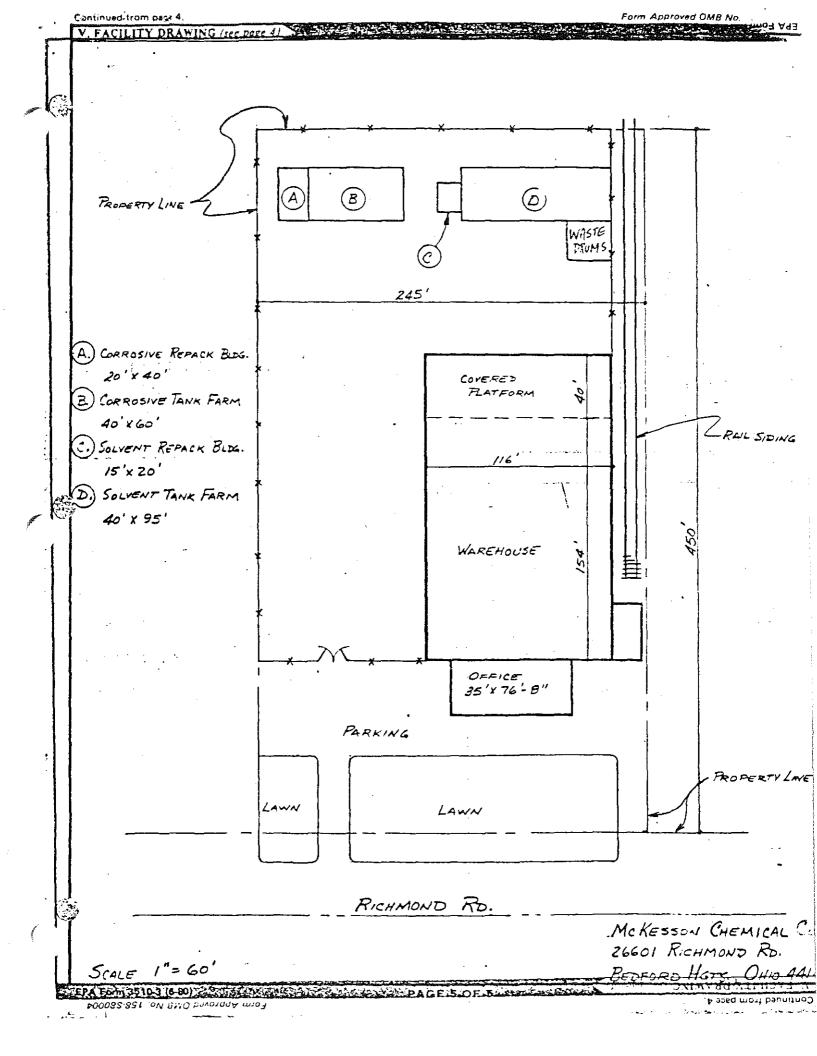
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cc: J. P. Hobe

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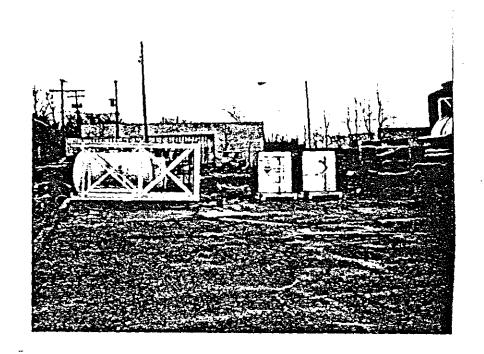


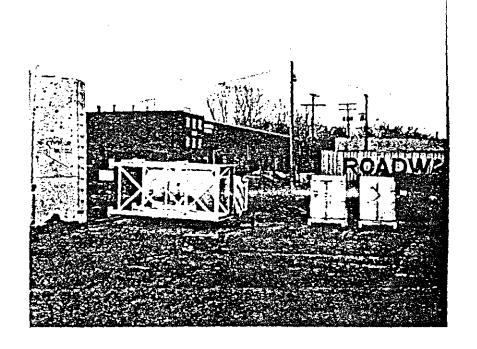




McKESSON CHEMICAL COMPANY Bedford Heights, OH

LOCATION OF STORAGE AREA FOR DRUMS OF HAZARDOUS WASTE





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# U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Continued from the front.

Continued from page 2. NOTE: Photocopy this page before completing if you	have more than 26 wastes to list	Form Approved OM8 No. 158-S80
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EPA Form 3510-3 (6-80)

November 20, 1980



EPA Region V RCRA Activities P O BOX 7861 Chicago, IL 60680

Re: McKesson Chemical Company's Listing for RCRA OMB #158-S79016

### Gentlemen:

On or prior to August 18, 1980, we filed with your office a Notification of Hazardous Waste Activity for our facilities at Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin Branches.

In that Notification, we advised that the facility would act as a transporter and or generator of hazardous waste.

We are primarily distributors of industrial chemicals for various chemical producers throughout the country. As an accommodation to our customers it is our intent to, from time to time, pick up several drums of material from our customer's facility that would fit the classification of a hazardous waste. We would transport this material to a recycler for recycling, not for disposal. Because of the distance this material must be transported, it would be necessary at times to store some of these drums on our facility for short periods to enable us to accumulate sufficient drums to make the transport economic.

We are informed that even though as a generator of hazardous waste we would be authorized to store our own waste for up to 90 days without requiring a permit, the storage of similar material belonging to our customers, in the course of transporting it to a recycler, would constitute our facility a hazardous waste management (storage) facility, for which a permit would be required.

Since we believe that what we propose would be a sound and responsible hazardous waste management activity, we would like to have the opportunity to do this. We are also advised that this requires an amendment of the Notification previously filed with you. We respectfully ask that this letter be accepted as an amendment to our Notification. We have prepared the permit application for the November 19th filing.

In addition, we have corrected the address number for our facility at Dolton, Illinois, and waste codes handled at our Rockford, Illinois Branch. Two facilities listed in the August filing; Decatur and Bartonville, Illinois, have been closed. Their operations have been transferred to the Normal, Illinois McKesson location.

We would ask acknowledgement of your acceptance of these amendments and changes. For your convenience, we enclose a copy of this letter on which your acknowledgement can be noted, and a stamped, self-addressed envelope with which it may be returned to us. Thank you for your very kind cooperation.

Respectfully,

G.N. Butter
Technical Director
McKesson Chemical Co.

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Enclosure

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Foremost-McKesson Chemical Group

McKesson Chemical Company Eastern Region 136 Summit Avenue Montvale, NJ 07645 201 573 9480

John P. Hobe Regional Vice President



November 18, 1980

EPA Region V RCRA Activities P. O. Box 7861 Chicago, IL 60680

Gentlemen:

On or prior to August 18, 1980, we filed with your office a Notification of Hazardous Waste Activity for our facility at Cleveland, OH.

In that Notification we advised the facility would act as a generator and transporter of hazardous waste.

We are primarily distributors of industrial chemicals for various chemical producers throughout the country. As an accomodation to our customers it is our intent to, from time to time, pick up a few drums of material from our customer's facility that would fit the classification of a recycler for recycling, not for disposal. Because of the distance this material must be transported, it would be necessary at times to store some of these drums on our facility for short periods to enable us to accumulate sufficient drums to make the transport economic.

We are informed that even though as a generator of hazardous waste we would be authorized to store our own waste for up to 90 days without requiring a permit, the storage of similar material belonging to our customers, in the course of transporting it to a recycler, would constitute our facility a hazardous waste management (storage) facility, for which a permit would be required.



Since we believe that what we propose would be a sound and responsible hazardous waste management activity, we would like to have the opportunity to do this. We are also advised that this requires an amendment of the Notification previously filed with you and the filing of a Part A permit application. We respectfully ask that this letter be accepted as an amendment to our Notification. We acknowledge certain items of information are missing (e.g. facility drawings, photographs, and geographic location), and will forward them as soon as they are obtained.

We would ask acknowledgement of your acceptance of this amendment. For your convenience, we enclose a copy of this letter on which your acknowledgement can be noted, and a stamped, self-addressed envelope with which it may be returned to us. Thank you for your very kind cooperation.

Respectfully,

J. P. Hobe

McKESSON CHEMICAL COMPANY

Regional Vice President

Enclosure

ACCEPTED:

Environmental Protection Agency Region

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	3. ES	TIM,	ATE	D A	NNUAL QUANTITY - For each	list	ed v	vas	te e									pantity of that waste that will be handled on an annual antity of ail the non-listed waste(s) that will be handled
ŀ		IIT C		IΕΑ	SURE — For each quantity enter	ed ii	n co	)lun	nn £	Ве	nter	r th	e u	nit	of me	asur	e code. Ur	Inits of measure which must be used and the appropriate
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1		to in	dica	te h	ow the waste will be stored, treate	d, a	nd/e	or d	lispo	ose	d of	at	the	fac	ility.			de(s) from the list of process codes contained in Item III
j																		imn A, select the code/s) from the list of process codes ose of all the non-listed hazardous wastes that possess
Ì		that	cha	acte	eristic or toxic contaminant.										•	•		e first three as described above; (2) Enter "000" in the
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1	2.				A of the next line enter the other ith above" and make no other enti						Mas	te P	Nun	nbei	r that	can	be used to	to describe the waste. In column D(2) on that line enter
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III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TO4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

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Continued from the front,

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EPA Form 3510-3 (6-80)

	IV. DESCRIPTION OF HAZARDOUS WASTES (conti	mucd)					35 A 34
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1	EPA I.D. NO. lenter from page 1)					•	
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Ì	V. FACILITY DRAWING						V-11-7
	All existing facilities must include in the space provided on page	qe 5 a scate drawin	g of the tacility (see instru	ictions far more o	etari).		
į	VI. PHOTOGRAPHS				<b>X</b>		
-	All existing facilities must include photographs (aerial	or ground—level	) that clearly delineate	all existing stru	ictures; e	xisting storage	Э,
ļ.	treatment and disposal greas; and sites of future storag	e, treatment or	disposal areas (see insti	ructions for mo	e detail).		A CONTRACT OF A AND
╌	VII. FACILITY GEOGRAPHIC LOCATION  LATITUDE (degrees, minutes, & seconds)						
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1.			Birth State County		20.00		
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Cartallary Fallican com.

### GRAHAM & JAMES

ONE MARITIME PLAZA

THIRD FLOOR

SAN FRANCISCO, CALIFORNIA 94III

TELEPHONE (415) 954-0200

WELLSHOIMS CHALGRAY SFO W. S. SHOIAS CHARAFOTSES, GJ SFO

M.C 1.67568 GARGE FACSIMILE PACSONIX (415) 391-5908

GIVE 415 GENE (46) 301-2493 GE/E (415) 351-2463 CASLE

CHEASEAY, SAN FRANCISCO, CA

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WRITER'S DIRECT DIAL NUMBER

PANTARAY, SAN FRANCISCO. CA VE TENS DIRECT DIAL IN MISER

October 2, 1986

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Director Ohio EPA/Solid & Hazardous Waste Management 261 E. Broad Street Columbus, OH 43216 Attn: David Mentzer

OCT 1 5 1986

UTTL MIU U.S. EPA. REGIÓN V 1PT TO 1170 CHA

EPA I.D. No. OHDOO71107791 McKesson - Cleveland

U.S. EPA, REGION V WASTE MANAGEMENT DIVISION OFFICE OF THE DIRECTOR

DSW, Inc. Request for Transfer of Permit

Dear Mr. Mentzer:

On September 25, 1986, McKesson and DSW, Inc. notified you of their request that the Part B permits currently held by McKesson Corporation be transferred to DSW, Inc. in accordance with the terms outlined in their joint request. Enclosed please find a revised Part B application for the Cleveland facility which may assist you im processing this transfer request.

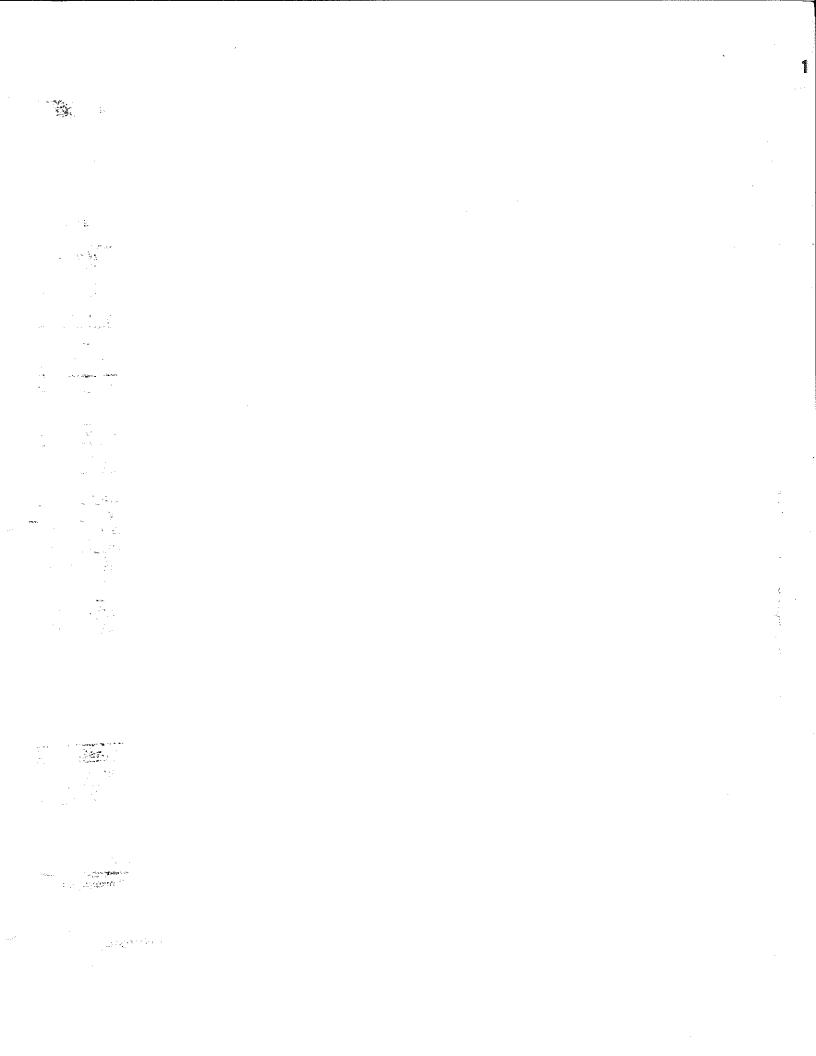
Financial responsibility data will be forwarded to rat@ed you shortly under separate cover.

Sincerely yours,

----for

GRAHAM & JAMES

JLH: pm Enclosure



#### Form Approved. OMB No. 2050-0028. Expires 9-30-88. GSA No. 0246-EPA-07 Please print or type with ELITE type (12 characters per inch) in the unshaded areas only United States Environmental Protection Agency Washington, DC 20460 Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation **SEPA Notification of Hazardous Waste Activity** and Recovery Act). For Official Use Only Comments C С **Date Received** (yr. day) Installation's EPA ID Number Approved F I. Name of Installation E В E II. Installation Mailing Address Street or P.O. Box R i đ R 0 d 2 0 1 C h m o n a 6 6 3 ZIP Code State City or Town 4 6 $O \mid H$ f d Η В d 0 g S Ш, Location of Installation Street or Route Number ã 2 1 R i n |d R 0 a 6 0 С h m Ю 5 City or Town State ZIP Code H d Η В 0 Installation Contact Phone Number (area code and number) Name and Title (last, first, and job title) 5 0 2 2 9 2 0 1 C 1 i f g Μ O B. Type of Ownership (enter code) A. Name of Installation's Legal Owner To be a subsidiary P Univar Corporation C D S W, Ι Ν VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.) **B. Used Oil Fuel Activities** A. Hazardous Waste Activity ☐ 1b. Less than 1,000 kg/mo. ☐ 6. Off-Specification Used Oil Fuel X 1a. Generator (enter 'X' and mark appropriate boxes below) 2. Transporter a. Generator Marketing to Burner 3. Treater/Storer/Disposer 4. Underground Injection b. Other Marketer 5. Market or Burn Hazardous Waste Fuel C. Burner (enter 'X' and mark appropriate boxes below) ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner) a. Generator Marketing to Burner Who First Claims the Oil Meets the Specification D b. Other Marketer VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.) C. Industrial Furnace B. Industrial Boiler A. Utility Soiler VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es) A. Air B. Rail C. Highway D. Water E. Other (specify) IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous wasta activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

B. Subsequent Notification (complete item C)

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

A. First Notification

Continue on reverse

C. Installation's EPA ID Number

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E. Characteristics of Nonlisted Hazard	dous Wastes. Mark	X' in the boxes	corresponding to t	ne characteristics of n	onlisted hazardous wastes
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Signature		lame and Offic	oial Title (type or pr	int)	Date Signed:

EPA Form 8700-12 (Rev. 14-85) Reverse

#### PREAMBLE

DSW, Inc., a Washington corporation headquartered at 1600 Norton Building, Seattle, Washington 98104, will acquire this facility on or about October 24, 1986. At the time of acquisition, DSW, Inc. will be a wholly-owned subsidiary of Univar Corporation, a Delaware corporation. DSW, Inc. will operate this facility under the name Van Waters & Rogers. Van Waters & Rogers is the chemical distribution division of Univar Corporation.

The procedures, policies, and personnel in place for McKesson Chemical Company, including the existing arrangement between this facility and McKesson Envirosystems for waste analysis and recycling, will be maintained pending further review by the new owner. No material changes in these aspects of the operations which require prior notification to appropriate agencies shall be made until such notification has been made and/or other appropriate approvals obtained in accordance with all applicable laws, rules, and regulations.

Unless indicated otherwise, employee training conducted prior to October 24, 1986 was conducted by McKesson Chemical Company. DSW, Inc. has retained the McKesson Chemical training personnel and will continue to use the McKesson Chemical training program.

This permit application is identical to that originally submitted by McKesson Chemical Company except for facility name and ownership changes. Site personnel lists and closure cost estimates have also been updated.

Prior correspondence by McKesson Chemical Company which is relevant to this revised aplication, such as contingency plan letters and the most recent closure cost updates, is included in this application. All existing agreements relevant to the Contingency Plan will be maintained. The appropriate agencies are being notified of this change in ownership. Original maps, drawings, etc. are on file with the agency and, since no changes to these documents are necessary, they have not been resubmitted in this application.

DSW, Inc.
Certification
(40 CFR Scc. 122.6(a)(d))

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

This statement applies to the filing in behalf of DSW, Inc.

SEP 2 4 1985

Date:

Signature:

Mark Hooper, President

DSW, Inc.

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Consolidated Permits Program (Read the "General Instructions" before starting.)

HD071107791

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6601 Richmond Road edford Heights

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I. EPA I.D. NUMBER 0 H D 0 F

GENERAL INSTRUCTIONS

If a preprinted label has been provided, atfix it in the designated space. Review the informstion carefully; if any of it is incorrect cross appropriate fill—in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill—in area(s) below, if the label is complete and correct, you need not complete items I, ItI, V, and VI (except VI-8 which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

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C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or 8 above? (FORM 2C)	23	X		D. Is this a proposed facility (other tran those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)	į		27
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X	19	30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	32
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro- duction, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	10	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
<ol> <li>Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in- structions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)</li> </ol>	40	X	42	J. Is this facility a proposed stationary acures which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)	43	x	43
III. NAME OF FACILITY			4				4 116 12
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XI. MAP	Part of the second and	144723	The State of the	
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XII, NATURE OF BUSINESS (provide a brief descri	ptioni - S.E.			-4:3:3 - F
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IV. DESCRIPTION OF HAZARDOUS WASTES  A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.														
B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.														
C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:														
	ENGLISH UNIT OF MEASURE CODE POUNDS						<b>E</b>			METRIC UNIT OF MEASURE CODE KILOGRAMS				
				s use any other unit of measure to opriate density or specific gravity				he u	nits	of me	:8S(	ure must	be conve	erted into one of the required units of measure taking into
<ul> <li>D. PROCESSES <ol> <li>PROCESS CODES:</li></ol></li></ul>														
HA O WA											D. PROCESSES  2. PROCESS DESCRIPTION (If a code is not entered in D(1))			
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EPA Form 3510-3 (6-80) PAGE 2 OF 5 CONTINUE ON PAGE 3														

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Continued from the front.

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IV. DESCRIPTION OF HAZARDOUS WASTES (continu		
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V. FACILITY DRAWING	CONTRACTOR PROPERTY.	
All existing facilities must include in the space provided on page 5	a scale drawing of the facility (see instruction	ns for more detaii).
VI. PHOTOGRAPHS		The state of the s
All existing facilities must include photographs (aerial or		
		ONSTOLINGIE HELDIT.
ratment and disposal areas; and sites of future storage, a		
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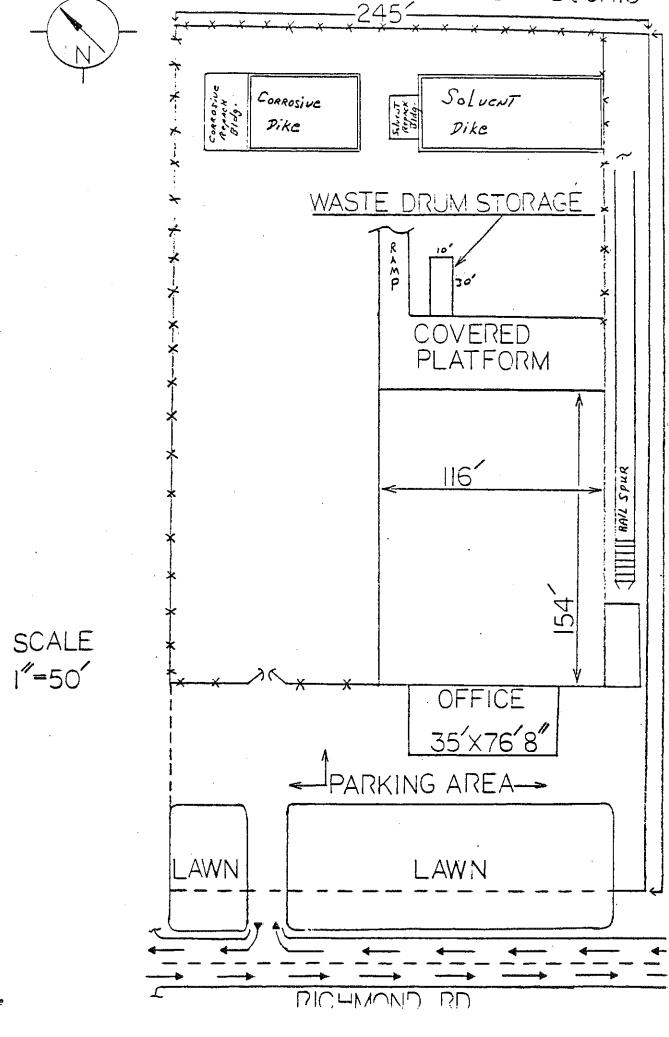
PAGE J OF 5

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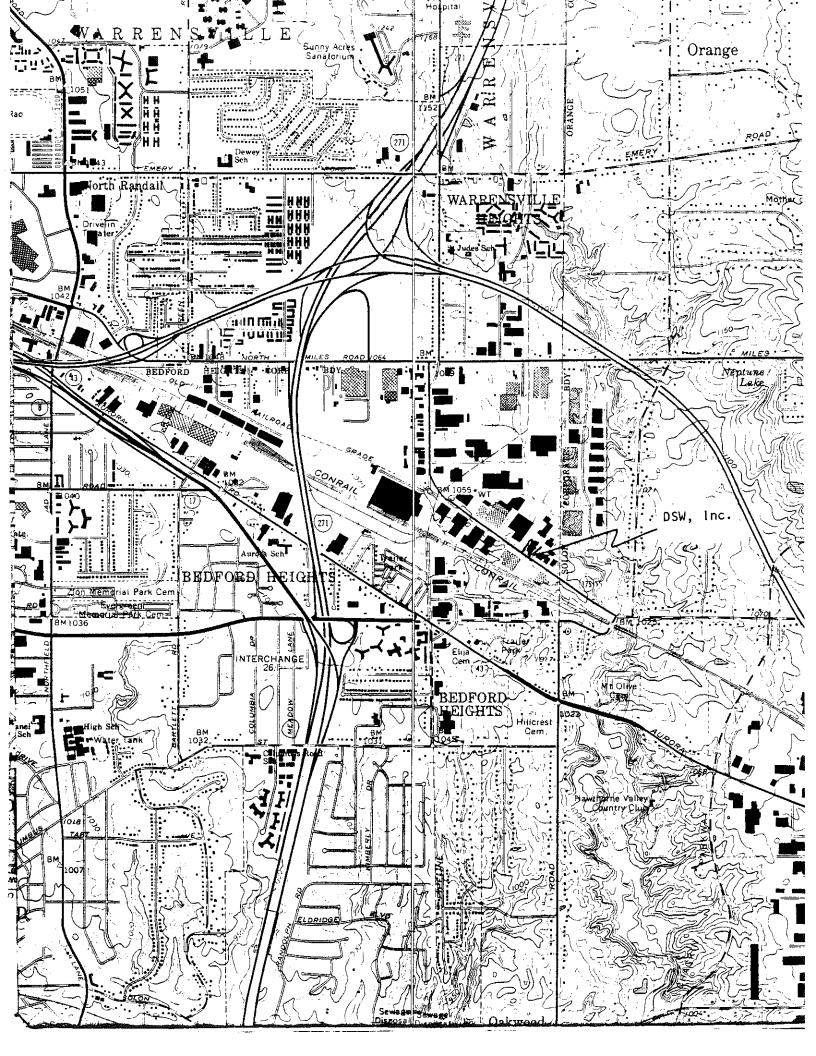
V. FACILITY DRAWING (see page 4)

Note: SEE ATTACHED SITE PLAN

AND LOCATION MAP.



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## General Description of Facility (40 CFR Sec. 122.25(a)(1))

DSW, Inc. leases and operates a distributing facility in the City of Bedford Heights, Ohio, located at 26601 Richmond Road. The legal description of its location is as follows:

"Situated in the City of Bedford Heights, County of Cuyahoga and State of Ohio, being a part of Original Lot No. 20 in Bedford Township, bounded and described as follows:

Beginning at a point in the Northerly line of Richmond Road, 50 feet wide, distant 969.61 feet as measured along said Northerly line of Richmond Road from its intersection with the Easterly line of the Village of Bedford Heights, said point being the Southeasterly corner of land conveyed or about to be conveyed to Arrow Sash, Doors & Plywood, Inc.

- (1) Thence North 36°03' 07" East along the Easterly line of land conveyed or about to be conveyed as aforesaid, 450 feet;
- (2) Thence South 53° 56' 53" East, parallel to Richmond Road, 245 feet to the West line of lands conveyed by deed from Erie Land and Improvement Company of Pennsylvania to Larry Davis, recorded in Volume 10131, at Page 46 of Cuyahoga County Deed Records;
- (3) Thence South 36°03' 07" West, along said Westerly line of lands conveyed as aforesaid to Larry Davis, 450 feet to said

General Description of Facility (40 CFR Sec. 122.25(a)(1)) Page 2.

Northerly line of Richmond Road;

(4) Thence North 53° 56' 53" West, along said Northerly line of Richmond Road, 245 feet to the point or place of beginning, containing 2.531 acres more or less, but subject to all legal highways."

DSW, Inc. is a nationwide distributor of various industrial chemicals. McKesson Envirosystems

operates a number of recycling plants across the country and functions as a natural partner to the distribution network which DSW, Inc. maintains.

The recycling of spent solvents is but one of the services DSW, Inc. offers to its customers. Many customers who employ our reclaiming services are those who purchased the virgin product from us in the first place. In this manner, DSW, Inc. provides a means for our customers to properly manage their wastes and to conserve resources.

The building in Bedford Heights consists of a masonry, steel-framed building of approximately 20,500 square feet. Of this total area, approximately 2,700 square feet is office and the remainer is warehouse storage. The area designated and designed for hazardous waste storage consists of 300 square feet, measuring 10 feet by 30 feet, located in the outside yard area adjacent to the building, accessible from the building for forklift handling of drums from the dock unloading area by means of a concrete ramp. Overall yard area is about 110,000 square

DSW, Inc.
General Description of Facility
(40 CFR Sec. 122.25(a)(1))
Page 3.

feet, of which approximately 86,000 square feet is fenced in.

This facility will be utilized by DSW, Inc. as a temporary storage facility for various chemical solvents destined for recycling. The operation followed is one of picking up a customer's (generator's) spent materials, bringing the material back to the DSW, Inc. facility, and placing it into temporary storage until a full truckload of various customer's materials are accumulated, and then reshipping the materials to the recycling center. The containers in which these spent materials are shipped to our facility are of a 55 gallon capacity meeting all DOT specifications for the material being shipped in them. All materials are received, stored, and reshipped in the same container.

The designated storage area for waste materials is to be a bermed rectangle of concrete, 10 feet by 30 feet by 6 inches. The entire outside storage area lying adjacent to the building is surrounded by a 6 foot high chain link fence with the top arms of posts being set at a 45 degree angle from vertical and holding 3 strands of barbed wire extending 1 foot above the top of the chain link fencing.

All movements and handling of materials designated as hazardous wastes at the facility shall be undertaken in accordance with operational plans as outlined in this application. No treatment, processing, or disposal of hazardous wastes will take place at this location.

CERT. 22, 1803

DSW, Inc.
General Description of Facility
(40 CFR Sec. 122.25(a)(1))
Page 4.

Experience at other branches handling these types of spent solvent streams indicate the following types of industries are served:

Metalworking: A wide variety of metalworking and machinery manufacture operations require a final degreasing step in order to remove lubricating oil, etc.: lathing, grinding, cutting, stamping. The chlorinated solvents are the work-horses of this business.

Electronic: Circuit boards commonly require a de-oiling step to remove lubricants, solder fluxes, etc. Although the chlorinated solvents are effective, the fluorinated counterparts are generally preferred.

Ink, Adhesives: A wide variety of oxygen — containing solvents are used in cleaning out mixing vats, printing rolls, transfer containers, piping, etc.

Other Industries from which spent solvent streams have been obtained include pharmaceutical, photographic, electrical, textiles, rubber, and plastics.

An engineering drawing of this facility's physical layout, certified by an Ohio — licensed engineer, follows.

General Description of Facility (40 CFR Sec. 122.25(a)(1)) Page 5.

This plan, dating from the time of construction of the facility, locates the active drains to the storm sewer. The 18 inch square trench drain between the two tank areas has been paved over. The proposed hazardous waste storage area is located on a high point of the yard. Essentially the entire yard is now paved with concrete, eight inches thick, with enough load-bearing capacity to handle trucks with 80,000 lbs. gross weight.

There are no injection or withdrawal wells on the property. There are no flood controls, run-off controls, or drainage carriers other than the stormwater drainage system and ditches noted on the plot plan. Fire controls (Fire hydrants) are noted on the plan.

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Chemical and Physical Analyses
(40 CFR Sec. 122.25(a)(2))

DSW, Inc. . and McKesson Envirosystems

requires all generators who wish to employ the Company's services to provide data regarding the chemical make-up of the generators' waste stream before pick-up of the material is initiated.

Both the DSW, Inc. branch storing spent solvents, and the McKesson Envirosystems facility which will recycle the material, shall be provided appropriate data from the information furnished by the customer (generator), which will have been reviewed and evaluated by the technically trained people at the Fort Wayne, Indiana, headquarters of McKesson Envirosystems.

A full description of the procedures and sequence of events pertaining to the accumulation of data and analytical information made available and kept on file at the storage facility before approval to accept materials, is outlined in the Waste Analysis Plan in the next Section. This procedure describes fully the operation followed in developing and disseminating the necessary information to assure that all facilities handling the material have adequate information available to properly manage a given waste stream.

DSW, Inc. shall provide to off-site generators wishing to utilize its services any requested proof of appropriate permits to be allowed to handle their particular waste streams. Generators shall also be offered the opportunity to take a tour of any company facility, as well as the actual recycling plants, to allow them an opportunity to assure themselves of compliance of these facilities.

<sup>\*</sup> or another permitted
facility

<sup>\*\*</sup> or another commercial
 laboratory using US
 EPA approved testing
 methods and procedures

# Wastes Anticipated To Be Handled in Dryms At Fac ity DSW, Inc.

Chemical	Hazard	Basis For Hazard Designation
Tetrachloroethylene	Toxic	Listed waste FOO1, FOO2
Trichloroethylene	Toxic	Listed waste FOOl, FOO2
Methylene Chloride	Toxic	Listed waste FOO1, FOO2
1,1,1 Trichloroethane	Toxic	Listed waste FOOl, FOO2
Carbon Tetrachloride	Toxic	Listed waste FOOl
Chlorinated Fluorocarbons	Toxic	Listed waste F001, F002
Xylene	ignitable	Listed waste F003
Acetone	lgn'itable '	Listed waste F003
Ethyl Acetate	Ignitable	Listed waste F003
Ethyl Ether	lgnitable	Listed waste F003
Methyl Isobutyl Ketone	lgnitable	Listed waste F003
n-Butyl Alcohol	Ignitable	Listed waste F003
Cyclohexanone	Ignitable	Listed waste F003
Methanol	Ignitable	Listed waste F003
Toluene	Toxic, Ignitable	Listed waste F005
Methyl Ethyl Ketone	Toxic, Ignitable	Listed waste F005
İsobutanol	Toxic, Ignitable	Listed waste F005

The above will also be expected in the form of blends with each other, still in drums.

### Waste Analysis Plan (40 CFR Sec. 122.25(a)(3))

This facility of DSW, Inc. is seeking a permit to function simply as a short-term (probably less than a month) storage facility for a limited variety of spent organic solvents. These will be handled only in DOT-approved drums, and will usually have been picked up in small numbers from customers who had previously purchased the virgin material. Once a sufficient number of drums have been accumulated at the facility to make transport economically feasible they will be moved out-of-state for re-claiming (either New Jersey or Kentucky).

entity unto itself — in other words, it is a small chemical business. Typical of such small chemical distributorships, which carry out no manufacturing processes, the branch has no laboratory facilities. It would be uneconomic and financially impossible to have technical personnel and to equip a laboratory for the limited amount of material being handled. Even the cost of outside analytical work would be prohibitive, especially in view of the fact that such analytical work would duplicate the effort subsequently carried out by the recycling facility.

On the other hand, the purpose of a profitable reclaiming business is thwarted unless the constituents of the spent solvent stream being handled are known accurately. To this end the reclaiming facilities in New Castle, Kentucky, and Newark, New Jersey, (McKesson Envirosystems Company) maintain and operate a sophisticated analytical laboratory. Consequently, a DSW, Inc. distributor branch is assured of knowing exactly the content of each spent \* Or other location where a proper recycling facility is established.

DSW, Inc. Waste Analysis Plan (40CFR 122.25(a)(3)) Page 2.

solvent stream being proferred by a customer (generator). A sample of a proferred stream of uncertain content is sent to New Castle or to Newark to analysis; in addition, a Spent Material/Waste Products Survey form (most recent revision appended) is prepared by the customer in connection with each proferred stream, and a copy of a formal chemical analysis is requested of the customer. Both are filed at the branch. The procedure followed is detailed in the accompanying Waste Analysis and Verification Procedure.

DSW, Inc. has an established policy that requires each customer to certify that recyclable solvents proferred to DSW, Inc. are only listed wastes (FOOI through FOO5), and that they do not contain unacceptable materials. These unacceptable materials include such items as pesticides, known and suspected carcinogens, radioactive materials and poisons. With these restrictions, it is felt unnecessary to test for these products. Although, if they were, the procedures outlined in Publication SW-846, "Test Methods for Evaluating Solid Waste" would be followed. The customer does provide assays of his listed wastes, usually including the process from which it derived DSW, Inc. invariably knows the latter anyway because of its basic sales relationship with the customer). It should be noted DSW, Inc. has records of ongoing chemical and physical analyses of existing customers' materials resulting from analysis done at the McKesson Envirosystems recycling center.

In addition, all materials leaving the branch for recycling are shipped in the same container in which they arrived (unless, of course, container damage mandated a transfer).

<sup>\*</sup> Or other locations where a proper recycling facility is established.
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Waste Analysis Plan
(40CFR 122.25(a)(3))
Page 3.

Despite the reliance on another facility for actual chemical and physical analyses of the spent streams this DSW, Inc. branch handles, the branch recognizes its responsibility to inspect the drums received (264.13). As noted earlier, the branch has records of testing of products supplied previously by existing customers, and drums of spent solvent as they arrive are checked against manifest data which, in turn, are based on assay and analyses carried out previously by the laboratory of the recycling center. These inspections by the receiving branch's personnel are logged in accordance with the Inspection Schedule (122.25(5)).

A word is in order regarding parameters that are measured in order to handle the spent streams safely and to assure their economic potential:

PARAMETER	TEST METHOD	PURPOSE
Assay	Gas Chromatograph	To confirm identity and
		amount of recoverable
		component(s).
Specific Gravity	Balance	Useful in product identity
		permits conversion of
•		volume to weight.
Water	Karl Fischer Apparatus	Possible contamination.
Flash Point	Closed cup ASTM D56	Flammability danger.
ing pagamanan di sakaran mengangkan di sakaran di sakaran di sakaran di sakaran di sakaran di sakaran di sakar Sakaran sakaran di sakaran di sakaran di sakaran di sakaran di sakaran di sakaran di sakaran di sakaran di sak	_or. 093	and the second s
рН	pH Meter	Danger of corrosion.

REVIOED SEPT. 22, 1986 DSW, Inc.
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Page 4.

It should be noted that in many cases knowledge of exact compositions are not required — only that flammability is tested and that the product matches what was manifested. This reflects the fact that in taking a spent solvent from a customer and cleaning it by distillation, the subsequent product is usually sold by physical characteristics — not by chemical structure. Thus, in order to transport, store, and distill such spent material only a minimum of information about its makeup is required.

Each recycling facility is extremely careful to know exactly what it is handling in order to prevent damage to its equipment (as from corrosion) and to prevent accidents (such as would result from inadvertent handling equitable materials).

All analyses required for characterization of a hazardous waste stream from branch carried out by a McKesson Envirosystems laboratory—

and subsequently filed at the branch— follow the analytical procedures defined in SW-846, "Test Methods for Evaluating Solid Waste".

\* or another permitted facility

DSW, Inc.
Waste Analysis Plan
(40 CFR Sec. 122.25(a)(3))
Page 5.

Obviously, knowing the customer — the waste generator — is an important element of this process. The following page is an internal DSW, Incdocument depicting the sequence of approvals by DSW, Inc.management personnel prior to acceptance of spent streams from that generator.

## WASTE GENERATOR APPROVAL

DSW, Inc.

Vendor Information	6.	
To: Marketing & Product Management Home Office	From:	Date Region
Vendor Name	-	negion
Address	and the second s	
City, State, Zip Code		
Telephone Number	Contact	
Request originated by		Date
Branch:		
	Approvals	
Approved District Manager		Date
Yes No		
Approved Regional Mktg. & Prod. Manager		Date
Yes No		
Approved . Regional Vice Pissident		Date .
Yes No	·	}
Approved Vice President, Mktg, & Prod. Management	12.000.000.000.000.0000.0000.0000.0000.	Date
Yes No No Management		

REVISED SEPT. 22, 198**6**  DSW. Inc.

Waste Analysis and Verification Procedures
(40 CFR Sec. 122.25(a)(3))

The following pages describes the standard Waste Analysis and Verification Procedures now in effect at those

DSW, Inc. branches already permitted in the storage of hazardous wastes.

DSW, Inc.

- DSW, Inc. and McKesson Envirosystems' services to recycle a spent stream, a DSW, Inc. representative is either sent to the customer's location or makes contact with him to acquire a prepared Spent Material/Waste Product Survey form (copy attached along with preparation instructions). DSW, Inc. strongly urges the customer (who is the generator) to provide us with a physical and chemical analysis which he has either performed or has obtained from an outside laboratory.
- 2. The completed Spent Material/Waste Product Survey form and any laboratory physical and chemical analysis are returned to the respective branch which will be handling the generator's waste stream. A copy of the survey and any analyses are kept on file at the branch facility, while the original is mailed to McKesson Envirosystems.

along with copies of any laboratory analysis.

- 3. McKesson Envirosystems will evaluate the data contained on the Spent Material/Waste Product Survey form and the analytical reports on the waste stream and determine if the recycling facility has sufficient information to properly manage the material. A sample may be required by McKesson Envirosystems before a decision is made as to whether to accept a particular waste stream and, if so, copies of the laboratory reports are forwarded to the DSW, Inc. branch facility before the material is picked up.
- 4. Once McKesson Envirosystems has made a determination that sufficient knowledge of a particular waste stream is on hand, and approval is given by the Environmental Engineer, Marketing Manager, and Corporate Manager of Refinery Operations, the DSW, Inc. branch is notified.

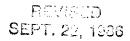
<sup>\*</sup> or another permitted
facility

- 5. With this approval on hand, the DSW, Inc. branch will notify the generator that the branch is authorized to pick up the material in accordance with the following procedure:
  - A. The generator completes an appropriate Hazardous Waste

    Manifest based on the Survey form and accompanying

    analytical data.
  - B. A copy of the Manifest is supplied to the local DSW, Inc. branch and is checked.
  - C. A copy of the Manifest, after its approval by Branch
    Management, is given to the truck driver and is to be
    in his possession until delivery of the material to the
    branch.
  - D. The material to be picked up is compared to the listing on the Manifest by the driver. In addition, he:
    - a. Evaluates the container for condition scaled, with no apparent leaks.
    - b. Locates the precautionary warning label,
       if required.
    - c. Ensures that no other labelling or stencilling is on the container other than the Hazardous Waste label, including trademarks, original vendor names, and

the like



- E. The driver also makes sure the Hazardous Waste Label on the drum is complete:
  - a. Generator name and address.
  - b. Contents.
  - c. Manifest number.
  - d. Proper shipping name.
  - e. E.P.A. 10 number.
  - f. Accumulation starting date.
- F. The driver picks up only that quantity and class of hazardous waste appearing on the Manifest.
- 6. Upon notice to McKesson Envirosystems that DSW, Inc. branch requires pick up of an accumulated load of spent material, McKesson Envirosystems simultaneously forwards a copy of all data accumulated on a particular waste stream to the respective recycling facility for review and filing at that location so that this information is available before actual receipt of the waste stream.
- 7. At the time a shipment is received at the recycling facility, a measurement and recording of the volume received of a particular generator's stream is made. Verification is made that the count contained on the accompanying shipment manifest document corresponds to the number of containers received and that the lot numbers assigned by the DSW, Inc.

sample is drawn from the various drum utilizing a sampling tube which will ensure a homogeneous (cross section) representation according to the following schedule:

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\* or another permitted facility

#### 7. cont'd.

,

- a. For ten or less drums in a particular generator's lot of a given product, all drums are sampled.
- b. For more than ten drums in a particular generator's lot of a given product, a statistical sampling of 40% of all drums, but not less than ten drums, is taken.

The container samples are then taken and an aliquot representation is composited for analytical verification. The sample taken at the recycling facility is labelled and identified with the following information:

- a. The manifest number.
- b. The generator's E.P.A. identification number.
- on the hazardous waste label on the drum.
- d. The E.P.A. hazardous waste code as 'it appears on the hazardous waste label on the drum.
- e. The date on which the shipment is received.
- f. The initials of the individual who took and composited the sample.

The drums are held in a specially designated and contained storage area where they are segregated according to generator and waste identification until the lab verification results are returned.

8. The composite sample of the received containers is taken to the on-site lab where gas chromotagraphic analysis is performed to ensure that the material is in fact one and the same as the description on the Spent Material/Waste Product Survey form, the manifest, the drum label, and any

waste stream.

lab reports which the generator may have provided. Based upon the results of the chromatographic analysis, further tests will be conducted as warranted Once verification is made, the approval is given by the Plant Manager, or that individual's designee, for movement of the drums into the processing

- 9. Should a discrepancy become apparent during the verification analysis, the recycling center will contact the DSW, Inc. branch who will in turn contact the generator to inform him of the discrepancy. Based upon the findings of the lab and the contact with the original generator, the shipment of the material having the evidence of a discrepancy may be refused, or an alternate means of handling the shipment will be arranged with the original generator.
- branch which was temporarily storing a generator's spent material. This copy is placed into the customer's file (original generator), which also contains a copy of the original Spent Material/Waste Product Survey form, any laboratory analytical reports, and any and all correspondence

between any of the parties involved regarding that particular generator's

10. A copy of the gas chromatographic analysis is returned to the DSW, Inc.

The net result of the preceding is that all shipments of recyclable materials sent to one of the recycling facilities are verified by the latter before they are processed. This step not only verifies the economic value of the spent stream but prevents damage to the equipment and hazard to personnel due to unexpected ingredients in the solvent.

Section I. General

Complete company name, address and zip code.

If generating plant is in a different location, please note

Omit Product Code.

#### Section 2. Marketing

The accurate completion of this section has a direct effect

- A. Pricing
- B. Method of pick up
- C. The decision as to where the spent material will be
- D. The request for a sample.

# Section 3. Physical Properties Complete to your best ability If the generator has any other analysis i.e. WR&R or Independent of the laboratory, please attach.

### Section 4. Hazardous Properties : Under RCRA hazardous waste will meet 4 basic properties:

- A. Ignitable Flash Point <140 F Actives, Hydrocarbons
  Lacquer Thinners, and blends of these sol
- B. Toxic Chlorinated and Fluorocarbons
- C. Corrosive Acids, Caustics, PH ∠2 or > 12.5
- D. Reactive TNT Waste water, Sodium Metal

Describe the property relative to the waste stream.

copy of this table should be on file at each DSW, Inc. branc

# Section 5. EPA-DOT Identification EPA hazardous waste numbers can be found by using the attached listing. (Taken from CFR #40, 5-19-80) Hazard codes describing the waste's properties listed in Section 4 can be found on the same listing. DOT hazardous material descriptions in addition to their hazard class and identification (UN or NA) numbers are found in the Hazardous Materials Table 5-22-80. A

Section 6. Chemical Composition

The basic components of the waste should be listed in this section along with their percentages of composition.

Again any other analysis reports on the stream should be attached.

# Section 7. General Any other information relative to the stream, or customer specifications on reclaimed and returned material, ie.drying addition of virgin material, packaging should be listed her

Section 8. The generator must sign this survey form.

Phone number, date filed, and federal EPA I.D. number must be completed.

#### FOR OF USE O

## Spent Material / Waste Products Survey

Please provide all information requested below, then return this form to your local, DSW, Inc.

Representativ:

COMPANY		·		·	SIC	NUMBER	<del></del>
MAILING ADDRESS	<del>(1)</del>	· · · · · · · · · · · · · · · · · · ·		,	PRC	DUCT CO	) <b>E</b>
DESCRIPTION OF SPENT MATERIAL	./ WASTE PROD	DUCT	INDICATE PR (BE SPECIFIC		GENERATES THIS	SPENT / W	ASTE
VOLUME			1	PER C	DNE IN	11	JLK
PHYSICAL PROPERTIES: PHYSICAL STATE AT 70°F  SOLID  SEMI-SOLID  SPECIFIC GRAVITY  % SULFUR	LIQUID, PH % CHL	ORINE	ASH POINT	DES	ARDOUS PROPE	ERTIES:	
EPA / DOT IDENTIFICATION  EPA HAZARDOUS WASTE NUME  DOT HAZARDOUS MATERIAL DESI  CHEMICAL COMPOSITION:	BERS	5	EPA	HAZARD CODE	s	****	
SUBSTANCE	MIN MA	AX TYP	SU	BSTANCE	MIN	MAX	TYP
6							
GENERAL:  1. PLEASE PROVIDE LAB ANALYS  2. PLEASE DISCUSS ANY OTHER						S ARE INVO	OLVED.
TO	CH ANY ADDITE	ONAL HAZAI	RD AND HANDLIN DGE AND ABILITY TE DESCRIPTION TITLE	TO DETERMINE OF THIS MATER	N TO THIS SHEET. THIS IS		
PHONE NUMBER (INCLUDE AREA (	CODE	1400	DATE	≣	ľ	ation no. EVICED F. 22, 19	

ž			•
			7
			See See See See See See See See See See
	,		

DSW,	Inc.	

#### Security

(40 CFR Sec. 122.25(a)(4), 264.14)

This DSW, Inc. facility employs a number of measures designed to assure adequate security in order to comply with government regulations and to assure the protection of Company assets.

This facility does not utilize a 24-hour entry surveillance system, but does have other means of control to provide adequate security. A fully automatic and monitored 24-hour fire alarm system is present at the facility.

The entire facility including the outside yard storage area, in which the designated waste storage area is included is maintained in a secure manner. As will be ovserved from the facility diagram, the building walls act as a barrier on the north side of the complex. On the east wall at the end of the building, fencing begins and surrounds the entire yard and truck dock and loading/unloading area until meeting up with the southwest corner of the building.

The fencing utilized to surround the outside areas of the facility where storage and loading/unloading activities are undertaken, is constructed of a 6 foot high, fabric type 11 gauge, 2 inch mesh chain link fence. Above the mesh fencing, supported on the top of the steep upright posts, are arms projecting 1 foot at a 45 degree angle from vertical, and holding 3 strands of barbed wire strung around the entire fence.

Access to the areas of the facility which are surrounded by the fence will be by means of one of two gates. Vehicle traffic may gain access to the loading/unloading dock area by way of a 24 foot gate constructed of similar materials as the fixed fencing previously described. This access is in

DSW, Inc. Security (40 CFR Sec. 122.25(a)(4), 264.14) Page 2

the western stretch of fence located to the South side of the building. The other access point through the fence consists of a 3 foot gate of similar construction to accomodate the rail entry. This gate is located on the eastern stretch of fence.

Both of the above mentioned gates are maintained in a closed and padlocked condition during all periods of facility non-working hours. During working hours, the fence gates are capable of being observed at all times from the general office. All visitors must gain access to the facility by way of the main office located on the northern side of the facility. A secured and attended vestibule area lies immediately inside the entrance door at which point a receptionist shall inquire as to the individual's identification and purpose of visit. While within the facility, it is DSW, Inc. policy that no one shall be allowed to gain access to any part of the immediate facility without having a DSW, Inc. employee accompanying them at all times. Any visits and/or inspections which may be pertinent to the functioning of the facility as a hazardous waste management facility, are to be logged in the facility's operating log.

All doors, as well as gates which were previously described, are maintained in a locked and secured condition during non-working hours.

Warning signs are posted at all fence gates and several other fence locations around the facility in such a manner to be visible from all angles of approach, and shall bear the legend "Danger-Unauthorized Personnel Keep Out". There shall also'be "No Smoking" signs posted in prominent positions in the yard and loading areas, as well as other precautionary and safety signs, to assure that no ignition sources are present in these areas. The restriction of smoking to

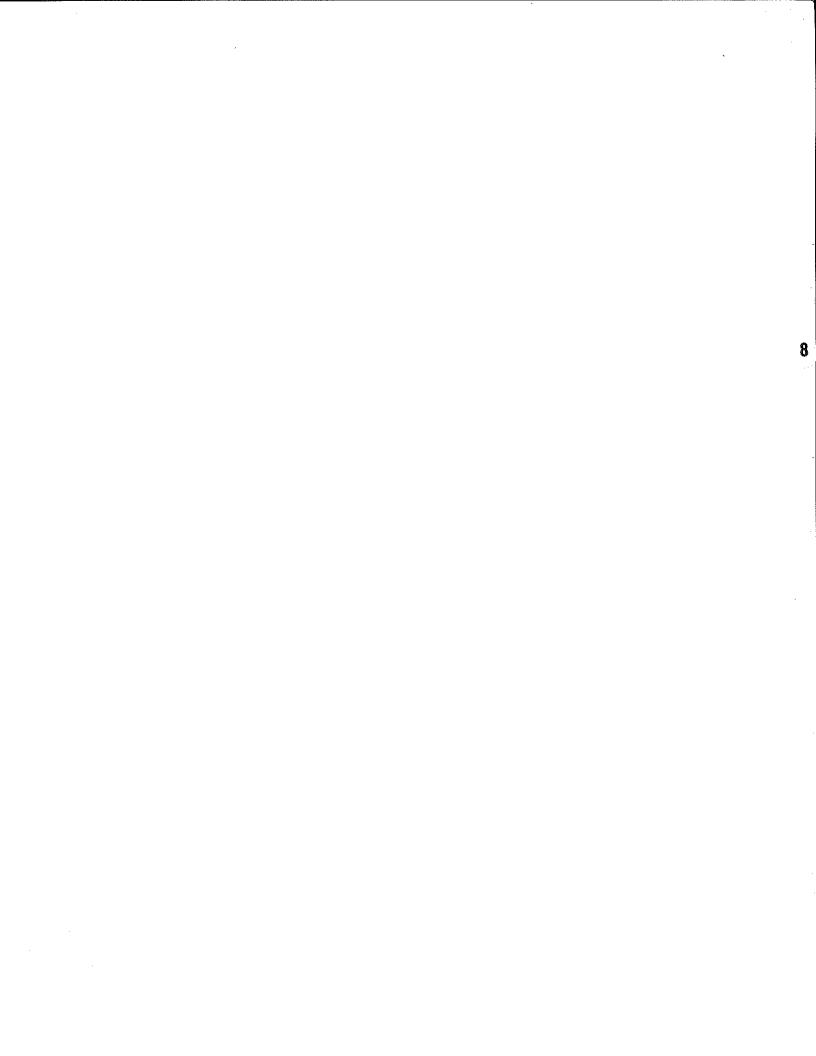
DSW, Inc. Security (40 CFR Sec. 122.25(a)(4), 264.14) Page 3

only designated areas is again a standard DSW, Inc. working '

No materials, empty pallets, or drums are permitted to be stacked against the fence in order to prevent easy agress or concealment.

All critical locks are changed when a key holder leaves the Company, when a key is lost, or every two years, whichever occurs first.

All available lighting will be utilized to illuminate the buildings, fence; and yard. Electric timer switches are installed to control the lighting.



Inspection Schedules, Equipment Requirements, and Preventative Measures

(40 CFR Sec. 122.25(a)(5), 264.15, 264.174, 264.194,

264.254, 264.255, 122.25(a)(6)

As a result of DSW, Inc. being only a distributor of chemicals (no manufacturing, no processing), any branch will employ a limited variety of equipment in its daily business. Those few pieces, plus particularly all equipment and apparatus involved with safety, do receive regular well-defined inspections routinely, and all are subject to preventive maintenance. The net result is a constant evaluation of all relevant equipment and its operation for possible malfunctions, structural deterioration, operator errors, and unintentional misuses which could affect human health or the environment.

Table I shows the items which are routinely inspected and the types of problems which could present themselves or cause an item to be nonfunctional. The items have been selected as those being important to the facility maintaining a safe working environment for the employees, and to being valuable in preventing a threat to the public and/or ecological systems.

Included in Table I is a listing of the frequency with which the items are inspected. It should be noted that in addition to these inspections which are routinely done by the branch personnel, DSW, Inc.

Company personnel not stationed at the facility, conduct a "Safety Audit" of the operation on a quarterly basis. This policy has been in place since 1978 and entails either the facility's District Manager or a member of the Regional Operations Department Staff's visiting the branch for what typically is a full day to inspect and evaluate the facility in approximately 180 areas pertaining to safety and operating procedures. Examples of areas checked are:

Inspection Schedules, Equipment Requirements & Preventative Measures
Page 2

- 1. Office area
- 2. Drivers' records
- 3. Fire protection
- 4. Maintenance
- Compliance with OSHA, DOT, all applicable rules and regulations
- 6. Security

- 8. Warehouse & dock
- 9. Yard area
- 10. Transportation
- 11. Physical layout & equipment
- General recordkeeping and control
- Compatibilities of stored materials.

Inspections of the hazardous waste container storage area will be conducted as outlined in Table 1. Results and documentation of any remedial actions which might be required will be recorded on an inspection log sheet similar to the one found following this narrative and entitled "Inspection Log Form". Information to be included on the log sheet shall include the item inspected, date and time of inspection, name of inspector, remedial action (if necessary), and supervisor's signature. has also developed the form DSW. Inc. entitled "In House Container Inspection Checklist", which is included immediately following the Inspection Log Form. Included on this form is a listing of areas which should be reviewed pertaining specifically to the area of container management. The inspector is required to check the status of each item and make a decision as to acceptable or unacceptable. On the lower portion of the form, are action codes for remedial activities which might be necessary to implement if conditions are found which might necessitate some action. Upon discovery, the appropriate personnel shall ensure that the proper actions to remedy an unsafe situation are undertaken. Any remedial actions shall be noted and kept on file with appropriate reports made, if necessary.

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DSW, Inc.
Inspection Schedules, Equipment Requirements
& Preventative Measures
Page 3

In addition to container inspections being logged, similar documentation is undertaken for Company quarterly safety inspections, sprinkler system inspections (weekly), fire extinguisher inspections (monthly) maintenance checklist (as designated by specific area), and governmental inspections (as performed).

This facility of DSW, Inc. does not utilize tanks of any sort for the management of waste materials. Thus, the regulations pertaining to inspections and the logging of such inspections on this type of equipment is not applicable.

This facility likewise does not utilize waste piles as a means of managing wastes, and the regulations pertaining to inspections and the logging of such inspections are not applicable.

If DSW, Inc. personnel, upon a routine inspection, find that a condition is present of a non-emergency nature which requires some type of maintenance in order to bring that particular article into compliance with standards, it shall be that employee's responsibility either to bring the subject concern into compliance, or to bring it to the facility management's attention to correct the deficiency. All remedial actions are undertaken at the earliest possible time in order to alleviate potential for further deterioration of equipment, or to eliminate an unsafe condition which could pose a threat to health or the environment.

If during an inspection a situation would be found which is of an emergency nature, or has the potential to be, the employee shall immediately initiate

DSW, Inc.
Inspection Schedules, Equipment Requirements,
& Preventative Measures
Page 4

remedial action, and notify the appropriate emergency coordinator who shall carry out his/her actions as outlined in the Contingency Plan. As outlined within the Contingency Plan, in the event of a release of materials, it shall be the objective to contain, isolate, clean-up, and decontaminate the affected area with the utmost concern for minimizing risk to Company workers, the public, and the environment. The clean-up material must then be properly disposed of, and necessary documentation and reporting undertaken.

Inspection logs are maintained and kept at the facility by the Operations

Manager. The format of the inspection log is included at the end of this

narrative and is to be maintained at the facility for a minimum of 3 years

from the date of inspections. Any extraordinary occurrences such as a waste

release or fire requires a written report which shall be kept on file at the

facility, as well as being forwarded to the appropriate agencies and Company

personnel as outlined in the "Contingency Plan" section.

DSW. Inc. does not request a waiver of the preparedness and prevention requirements under 40 CFR 264 Subpart C. Requirements of this section of the regulations are to be complied with.

Specific discussion pertaining to internal and external communications capabilities, the internal alarm system, emergency equipment present on-site, fire control equipment present on-site and training in its use, is discussed either in this section accompanying "Contingency Plan".

The telephone system at this facility provides the main internal as well as external means of communication. A designated alarm system is utilized by

Inspection Schedules, Equipment Requirements, & Preventative Measures Page 5

branch personnel to act as an alert system for emergency situations with instruction and drills conducted on a routine basis.

Emergency equipment maintained at this facility is listed in the Contingency Plan.

Adequate water is provided at this facility by means of fire hydrants as shown on the facility site plan. The building itself is protected by a sprinkler system with an automatic alarm system hookup, although no waste materials are stored within the building.

#### DSW, Inc.

## Inspection Schedule (To be kept at Facility)

Area/Equipment	Specific Items		Frequency of Inspection
Container Storage Area	General Area	Leaks, spills	Daily
(Secondary Containment)	Container placement and stacking	Aisle space	Weekly
	Sealing of containers	Open bungs, lids	Weekly
	Labelling of con- tainers	Improper identi- fication Date missing illegibility	Weekly -
	Base	Cracks, erosion	Daily
	Berm	Cracks, deterioration	Daily
•	Warning signs	Damaged	Weekly
	Debris & refuse	Aesthetics	Weekly
	Accumulated liquid	Contamination	Daily, and confirm after precipitati
Security Devices	Facility fence	Corrosion, damage	Weekly
•	Main Gate	Corrosion, damage, non-functioning	Weekly
Loading, Unloading Areas	Surface areas	Deteriotation spills	Daily
	Dock bumpers	Damage	Daily

Inspection Schedule DSW, Inc. Page 2.

( )

Area/Equipment	Specific Items		requency of nspection
Safety & Emergency Equipment	Emergency shower & eye wash	Water pressure, leaks drainage	Weekly
	Industrial absorbent	Out of stock	Monthly/ as needed
	Overpack drums	Out of stock	Weekly
	Face shields	Broken or dirty	Monthly/ as needed
•	Chemical cartridge respirators with cartridges for organic solvents	Spent solvent, seals	Monthly/ after each use
	Portable pump	Power, clogging	Monthly
	Fire extinguishers	Recharging	After each
	Fire alarm systems	Power failure	Per NFPA
	Telephone system	Power failure	Per NFPA
	Emergency lighting system	Battery failure	Per NFPA
	First aid equipment and supplies	Items out of stock or inoperative	As used
	Protective clothing	Holes, wear & tear	As used
	Decontamination wash room	Water pressure, leaking drainage	As used
•	Forklifts	Brakes (includes parking), tires (pressure), horn, lights hoist, tilt, forks, steering, water level rad/batt., engine oil level, hydraulic oil lex	-

#### In House Container Inspection Checklist

Α.	L	ocation	YES	<u>NO</u>	Action
ì	•	Waste materials properly segregated according to DSW, Inc. compatibility storage program.	10-11-04	<del></del>	
2	· ·	ignitables (flammables, combustibles) located 50 feet from property lines.	-	_	
	١.	Aisles provided for emergency access.	<del>wouderoun</del>		
В.	<u>C</u> .	ontainer Condition			
1		All containers sealed.	<del>(FOOL-OLOGI</del> )	CENTRALIZA	· · · · · · · · · · · · · · · · · · ·
2	2.	Any leaking containers.		· ——	<del></del>
:	}.	Any containers swollen or bulged.	***************************************	-	
1	ᢤ.	Any containers concaved due to vacuum building up.	<del></del>		;
<u>.</u>	5.	Any containers with extreme corrosion	-	***********	<del></del>
6	<b>5.</b>	All containers properly labelled and identified.	<del></del>	·	
8	3.	All containers have lot number	THE PARTY OF THE P	-	G-1072 , years - replace - res - account course
ć	).	All containers compatible with products stored in them.			, -
		Inspector:	Date:		
		I have reviewed this report and certify all sto	rage is	in satisf	actory condition
		Supervisor:	Date:_		· · · · · · · · · · · · · · · · · · ·
Red	om	mended Action Codes			
Α -	- E	ffect DSW, Inc.compatibility program		-	
В.	- Е	ffect container receiving maintenance procedure	•	•	
c -	· E	ffect container transfer procedure		*	
D .	- E	ffect spill control procedure			
		I certify that the above recommended action has	been ta	aken on:	•
		Date: Storage is now satisf	actory.		
		Supervisor:	Date:		

• •			·	1	<u>.</u>	<u>-</u> -				 		
	INSPECTOR							ger 1-m8 2	-	 -	`	
RESULTS	DATE							,	-		The All All	
	REMEDIAL ACTION REQUIRED				·	-					-	
	OBSERVATIONS						-		-			
	+NSPECTOR											
INSPECTION	TIME											
1	DATE											•
	SUBJECT											